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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

NOEL WOODARD, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

BOEING EMPLOYEES' CREDIT  
UNION and KAYE-SMITH  
ENTERPRISES, INC.,

Defendants.

**Case No: 3:23-cv-01165-AR**

**CLASS ACTION**

**MOTION TO WITHDRAW  
PLAINTIFFS' JOINT MOTION  
TO CONSOLIDATE CASES, SET  
ASIDE PRIOR ORDER  
APPOINTING INTERIM CLASS  
COUNSEL AND APPOINT NEW  
INTERIM CLASS COUNSEL**

RICHARD KREFTING, individually, and  
on behalf of all others similarly situated,

**Case No. 3:23-cv-01164-AR**

Plaintiff,

v.

KAYE-SMITH ENTERPRISES, INC., and  
BOEING EMPLOYEES' CREDIT  
UNION,

Defendant.

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**Case No. 3:22-cv-01499-AR**

RICHARD SMITH, individually, and on  
behalf of all others similarly situated,

Plaintiff,

v.

KAYE-SMITH ENTERPRISES, INC.,

Defendant.

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**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Plaintiffs' Noel Woodard and Richard Krefting, through their counsel, Laura Van Note and William B. Federman, respectfully ask to withdraw the previously filed "Plaintiffs' Joint Motion to Consolidate Cases, Set Aside Prior Order Appointing Interim Class Counsel and Appoint New Interim Class Counsel," ECF #72, as the parties have reached a resolution in the case and are instead trying to dismiss the case. Defense counsel does not object to this motion to withdraw the prior filing.

RESPECTFULLY SUBMITTED BY:

Dated: December 4, 2023

**COLE & VAN NOTE**

By: /s/ Laura Grace Van Note  
Laura Grace Van Note, Esq.\*

Attorneys for Representative Plaintiff  
Noel Woodard

Dated: December 4, 2023

**FEDERMAN & SHERWOOD**

By: /s/ William B. Federman  
William B. Federman, Esq.\*

Attorneys for Representative Plaintiff  
Richard Krefting

\*Admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 4, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF and on counsel in the related cases to their respective emails per the below service list.

/s/ Laura Van Note  
Laura Van Note, Esq.